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* ADMITTED IN DC ONLY

March 28, 2018

Re: Chahal v. Credit Suisse Group AG et al, No. 18-cv-02268 (AT) (SN) (S.D.N.Y.);
Eisenberg v. Credit Suisse AG et al, No. 18-cv-02319 (AT) (SN) (S.D.N.Y.)

Dear Judge Torres:

We represent Defendants Credit Suisse AG, Credit Suisse Group AG, David R. Mathers, and Tidjane Thiam (together, the “Credit Suisse Defendants”) in the above-captioned actions. Janus Index & Calculation Services LLC is represented by Cadwalader, Wickersham & Taft LLP. We write on behalf of all parties pursuant to Part I.C of this Court’s Individual Rules and Practices to respectfully propose a schedule for further proceedings in this action.

On March 14, 2018, Plaintiff Rajan Chahal commenced the action captioned *Chahal v. Credit Suisse Group AG et al*, No. 18-cv-02268, by filing a complaint alleging violations of the Securities Act of 1933 and the Securities Exchange Act of 1934 against the Credit Suisse Defendants. Thereafter, on March 15, 2018, Plaintiff Glenn Eisenberg commenced a second, related action, captioned *Eisenberg v. Credit Suisse AG et al*, No. 18-cv-02319, alleging violations of the Securities Exchange Act of 1934 against the Credit Suisse Defendants and Janus Index & Calculation Services LLC. All Defendants have agreed to accept service of the summonses and complaints in both actions, while reserving their rights to assert any and all defenses in the matter, including but not limited to improper venue and lack of personal jurisdiction.

Recognizing that the Court has yet to consider any potential motion for consolidation of the actions, and that both actions are governed by the procedures and timelines set forth under the Private Securities Litigation Reform Act of 1995 (“PSLRA”) for appointing Lead Plaintiff(s) and Lead Counsel, the parties respectfully request that the Court adjourn without date Defendants’ time to move, answer, or otherwise respond to the complaints and

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adopt the schedule set forth below in each action (or in the event both actions are consolidated, any consolidated action):

- Motions for appointment of Lead Plaintiff and approval of counsel shall be due on May 15, 2018;
- Oppositions to motions for appointment as Lead Plaintiff and approval of counsel shall be due on May 29, 2018; and
- Replies in further support of motions for appointment as Lead Plaintiff and approval of counsel shall be due on June 5, 2018.
- Lead Plaintiff's Consolidated Amended Complaint shall be filed within 60 days after the Court's appointment of Lead Plaintiff and Lead Counsel;
- Defendants' deadlines to move, answer, or otherwise respond to the Consolidated Amended Complaint shall be 60 days after the filing of the Consolidated Amended Complaint;
- Lead Plaintiff's opposition to Defendants' motion to dismiss shall be filed within 60 days after the filing of Defendants' motion to dismiss; and
- Defendants' reply in further support of their motion to dismiss shall be filed within 20 days after the filing of Lead Plaintiff's opposition to the same.

This is the parties' first request for an adjournment in each action.

Respectfully submitted,



David G. Januszewski

The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15D
New York, New York 10007

The parties' motion is GRANTED. The defendants' deadline to respond to the complaints in both of these actions is ADJOUNDED sine die. The Court adopts the schedule as outlined in this letter. The plaintiffs are further ORDERED to file a joint letter of no more than two pages, by April 16, 2018, that discusses whether these two cases should be consolidated for all purposes.

SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

April 10, 2018
New York, New York